

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

x Civil Action No.  
FREEDOM MORTGAGE CORPORATION, : 16-cv-02569-RMB-KMW  
Plaintiff, :  
v. :  
LOANCARE, LLC (as successor to FNF: DECLARATION OF  
Servicing, Inc. and LoanCare, a Division of : MARK S. LANDMAN  
FNF Servicing, Inc.), :  
Defendant. x

**MARK S. LANDMAN** hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Landman Corsi Ballaine & Ford P.C., counsel for plaintiff Freedom Mortgage Corporation (“Freedom”) in this action.
2. I submit this Declaration in support of Freedom’s motion for my admission *pro hac vice* in this case.
3. I am duly admitted to practice before and in good standing of the Bars of the following state and federal courts:

| COURT   | OFFICE MAINTAINING ROLL   | DATES OF ADMISSION |
|---|---|--------------------|
| United States District Court<br>Southern District of New York | United States District Court<br>500 Pearl Street<br>New York, New York 10007-1312                           | 1982               |
| United States District Court<br>Eastern District of New York  | United States District Court<br>Eastern District of New York<br>225 Cadman Plaza East<br>Brooklyn, NY 11201 | 1982               |
| United States District Court<br>Western District of New York  | United States District Court<br>100 State Street<br>Rochester, NY 14614                                     | 1996               |

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| United States District Court<br>Northern District of New York    | United States District Court<br>Northern District of New York<br>James T. Foley Courthouse<br>445 Broadway, Suite 509<br>Albany, NY 12207   | 1977 |
| United States District Court District<br>of Columbia             | U.S. Courthouse<br>333 Constitution Avenue N.W.<br>Room 1225<br>Washington, D.C. 20001  | 1981 |
| United States District Court Eastern<br>District of Pennsylvania | James A. Byrne<br>U.S. Courthouse<br>601 Market Street<br>Philadelphia, PA 19106  | 1998 |
| State of New York  | Clerk's Office<br>Appellate Division, Third Judicial<br>Department<br>Robert Abrams Building for Law &<br>Justice<br>State Street, Room 511<br>Albany, New York 12223<br>Attn: Certificates of Good<br>Standing | 1977 |
| Commonwealth of Pennsylvania                                     | Supreme Court<br>468 City Hall<br>Philadelphia, PA 19107  | 1997 |
| District of Columbia   | District of Columbia Court of<br>Appeals<br>430 E Street, NW<br>Washington, DC 20001  | 1979 |
| United States District Court<br>Northern District of Illinois    | EASTERN DIVISION<br>Everett McKinley Dirksen United<br>States Courthouse<br>219 South Dearborn Street<br>Chicago, IL 60604  | 2001 |
| United States Court of Appeals<br>Second Circuit                 | Thurgood Marshall United States<br>Courthouse<br>40 Foley Square<br>New York, NY 10007  | 1991 |
| United States Supreme Court                                      | 1 First St NE<br>Washington, DC 20543   | 1980 |
| United States District Court Eastern                             | United States District Court for the  | 2000 |

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| District of Michigan                                     | Eastern District of Michigan<br>Clerk's Office<br>Federal Building and U.S.<br>Courthouse<br>600 Church Street, Room 140<br>Flint, MI 48502                                 |      |
| United States District Court District<br>of Connecticut  | Brien McMahon Federal Building<br>United States District Court<br>915 Lafayette Boulevard<br>Bridgeport, CT 06604   | 2006 |
| United States Court of Appeals<br>Ninth Circuit          | 95 7th Street<br>San Francisco, CA 94103  | 2009 |
| United States Court of Appeals<br>for the Fourth Circuit | 1100 East Main Street, Suite 501<br>Richmond, VA 23219  | 2012 |
| United States Court of Appeals<br>Eleventh Circuit       | 56 Forsyth Street, N.W.<br>Atlanta, Georgia 30303   | 1998 |
| United States Court of Appeals<br>Sixth Circuit          | Office of the Clerk<br>United States Court of Appeals<br>for the Sixth Circuit<br>540 Potter Stewart, U.S. Courthouse<br>100 E. Fifth Street<br>Cincinnati, Ohio 45202-3988 | 2013 |

4. There are no disciplinary proceedings pending against me, nor has any discipline been previously imposed on me in any jurisdiction.

5. Freedom wishes me to assist in its representation in this case because I am familiar with the law and the facts relevant to this matter. In particular, this lawsuit involves issues and claims arising out of the servicing of mortgage loans, an area in which I am experienced.

6. I am associated in this matter with Jerry A. Cuomo of the Newark, New Jersey office of Landman Corsi Ballaine & Ford P.C., who is authorized to practice in New Jersey and before this Court, and who is a member in good standing of the bar of this Court.

7. I understand that, upon my admission *pro hac vice*, I will be within the disciplinary

jurisdiction of this Court, and will make payment, as required by Local Civil Rule 101.1(c)(2) and (3) to the New Jersey Lawyers' Fund for Client Protection and to the Clerk of the Court.

8. I agree to notify the Court immediately of any matter affecting my standing at the bar of any other court.

9. For these reasons, I respectfully request that the Court enter an order granting my admission *pro hac vice* for the purpose of representing Freedom in this case.

10. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

**Dated: July 12, 2016**  
New York, NY

  
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Mark S. Landman